

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
STEPHEN D. GILL and MICHELLE GILL,)	
)	
Plaintiffs,)	CIVIL ACTION
)	NO. 05-10309-MLW
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	
_____)	

**DEFENDANT'S ASSENTED TO MOTION
TO EXTEND TIME TO ANSWER
OR OTHERWISE RESPOND TO COMPLAINT**

The United States, by and through its attorney, Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves for an extension of time, to and including May 18, 2005, within which to answer or otherwise respond to the Complaint in the above-captioned case. This is the first request for an extension. As grounds for this motion, the undersigned counsel states that she has not yet received all relevant materials from the Department of the Navy and the Department of Labor. She requires these materials in order to adequately prepare a response to the Complaint. The undersigned contacted the plaintiffs' counsel, Timothy Morgan, Esq., and he has assented to this request for extension of time.

WHEREFORE, the government respectfully requests that the Court allow this motion for an extension of time in which to answer or otherwise respond to the Complaint.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

/s/Eugenia M. Carris
Eugenia M. Carris
Assistant United States Attorney
U.S. Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617) 748-3100

Dated: April 14, 2005

L.R. 7.1 Certification

The undersigned counsel states that she has contacted plaintiffs' counsel on April 8, 2005, and received his assent to this motion.

/s/Eugenia M. Carris
Eugenia M. Carris

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was mailed, first class mail on April 14, 2005, upon plaintiffs' counsel, Timothy Morgan, Esq. and Kristen Materne, Esq., 33 College Hill Road, Suite 16G, Warwick, RI 02886. The foregoing was also mailed on this date to pro se plaintiff Stephen D. Gill, Esq., Young, Bill, Fugett & Roumbos, P.A., P.O. Drawer 1070, Pensacola, FL 32591-1070.

/s/Eugenia M. Carris
Eugenia M. Carris